

## STATE OF SOUTH CAROLINA

## (Caption of Case)

IN THE MATTER OF PETITION OF SPRINT  
COMMUNICATIONS COMPANY L.P. AND  
SPRINT SPECTRUM L. P. D/B/A SPRINT PCS  
FOR ARBITRATION OF RATES, TERMS AND  
CONDITIONS OF INTERCONNECTION WITH  
BELL SOUTH TELECOMMUNICATIONS, INC. D/  
B/A AT&T SOUTH CAROLINA D/B/A AT&T  
SOUTHEAST

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2007 - 215 - C

(Please type or print) J. Jeffrey Pascoe  
Submitted by:

SC Bar Number: 71104

Telephone: 864.255.5422

Fax: 864.239.5855

Other:

Address: 550 So. Main Street, Suite 400  
Greenville, SC 29601

Email: jpascoe@wcsr.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

[illegible]

Sprint Nextel Corporation respectfully moves the Public Service Commission of South Carolina (the “Commission”) to permit Joseph M. Chiarelli to practice *pro hac vice* before the Commission in the above-captioned matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Chiarelli and the undersigned counsel of record have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina, a copy of which is attached as Exhibit A.

Respectfully submitted this 10<sup>th</sup> day of July, 2007.

/s/ J. Jeffrey Pascoe

J. Jeffrey Pascoe (SC Bar No. 71104)

Womble Carlyle Sandridge & Rice

PO Box 10208 (29603)

550 South Main Street

Suite 400

Greenville, SC 29601

(864) 255-5422 (Telephone)

(864) 255-5440 (Facsimile)

Attorney for Sprint Nextel Corporation

# **EXHIBIT A**

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

IN THE MATTER OF PETITION OF  
SPRINT COMMUNICATIONS  
COMPANY L.P. AND SPRINT  
SPECTRUM L.P. D/B/A SPRINT PCS  
FOR ARBITRATION OF RATES,  
TERMS AND CONDITIONS OF  
INTERCONNECTION WITH  
BELLSOUTH  
TELECOMMUNICATIONS, INC. D/B/A  
AT&T SOUTH CAROLINA D/B/A  
AT&T SOUTHEAST

2007-215-C

BEFORE THE PUBLIC  
SERVICE COMMISSION OF  
SOUTH CAROLINA

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: 101 Executive Center Drive  
Suite 100, Columbia, SC 29210

Defendant

Comes now Joseph M. Chiarelli, applicant herein, and respectfully represents the following:

1. Applicant resides at:

1212 S.E. 11<sup>th</sup> Terrace

Street Address

Lee's Summit

City

816-525-6169

Telephone

Jackson

County

MO

State

64081

Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Sprint Nextel Corporation, with offices at,

6450 Sprint Parkway, Mailstop KSOPHNO214-2A671

Street Address

Overland Park

City

913-315-9223

Telephone

Johnson

County

KS

State

66251

Zip Code

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Sprint Nextel Corporation to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since May of 1989, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Kansas where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

Highest court in the State of Missouri	September 15, 1984
United States Supreme Court	July 17, 1989
U.S. district Court for the District of Kansas	May 1989
Eighth Circuit Court of Appeals	February 1988
U.S. District Court for the Western District of Missouri	September 1984

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is J. Jeffrey Pascoe, of the Womble Carlyle Sandridge & Rice, PLLC law firm, which has offices at:

550 So. Main Street, Suite 400

Street Address

Greenville

Greenville

South Carolina

29601

County

City

State

Zip Code

864-255-5422

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

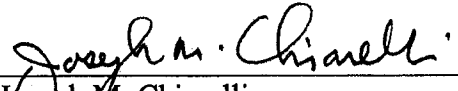
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice before the above-captioned agency for this matter.

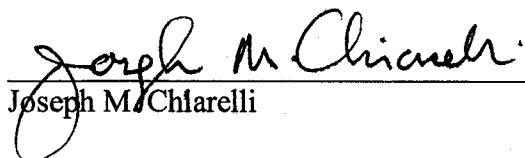
Dated this 5<sup>th</sup> day of July, 2007.

  
\_\_\_\_\_  
Joseph M. Chiarelli

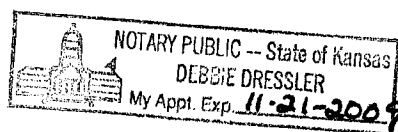
VERIFICATION

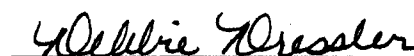
STATE OF KANSAS                    )  
  )  
COUNTY OF JOHNSON            )

I, Joseph M. Chiarelli, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters, I believe them to be true.

  
Joseph M. Chiarelli

Subscribed and sworn to before me this  
5<sup>th</sup> day of July, 2007.

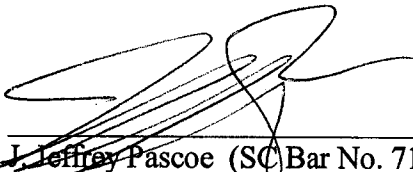


  
Notary Public for the State of Kansas  
My Commission Expires: 11-21-2009



## LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to the Rules governing Admission *Pro Hac Vice* to the South Carolina Bar.



---

J. Jeffrey Pascoe (SC Bar No. 71104)  
Womble Carlyle Sandridge & Rice  
PO Box 10208 (29603)  
550 South Main Street  
Suite 400  
Greenville, SC 29601  
(864) 255-5422 (Telephone)  
(864) 255-5440 (Facsimile)

Attorney for Sprint Nextel Corporation

# The Supreme Court of Kansas



## Certificate of Good Standing

I, **Carol G. Green**, Clerk of the Supreme Court of the State of Kansas, do hereby certify that the Supreme Court of Kansas is the highest court of law, and the court of last resort within the State of Kansas, and has exclusive jurisdiction over and control of the admission of applicants to the bar of this state.

I do further certify that on May 12, 1989,

JOSEPH M. CHIARELLI

was duly admitted to practice as an attorney and counselor of the Supreme Court and all other courts of the State of Kansas and is, on the date indicated below, a member in good standing of the Kansas Bar.

**ACTIVE STATUS**

Witness my hand and the seal of the Supreme Court, hereto affixed at my office in Topeka, Kansas, this 22<sup>ND</sup> day of June, 2007.

Carol G. Green  
Clerk of the Supreme Court of Kansas

# *The Supreme Court of Missouri*



## *Certificate of Admission as an Attorney at Law*

I, Thomas F. Simon, Clerk of the Supreme Court of Missouri, do hereby certify that the records of this office show that on September 15, 1984,

*Joseph Michael Chiarelli*

was duly admitted and licensed to practice as an Attorney and Counselor at Law in the Supreme Court of Missouri and all courts of record in this state, and is, on the date indicated below, a member in good standing of this Bar.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the Supreme Court of Missouri at my office in Jefferson City, Missouri, this 26<sup>th</sup> day of June, 2007.

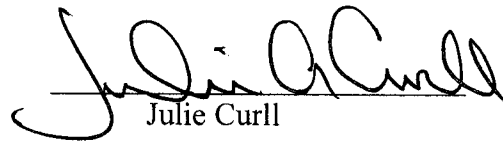
A handwritten signature in black ink, appearing to read "Thomas F. Simon", written over a horizontal line.

Clerk of the Supreme Court of Missouri

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is employed by Womble Carlyle Sandridge & Rice and that she has caused Sprint Nextel Corporation's MOTION FOR ADMISSION *PRO HAC VICE* in Docket No. 2007-215-C to be served upon the following via United States Mail, July 10, 2007:

Patrick W. Turner, Esquire  
General Counsel-South Carolina  
BellSouth Telecommunications  
Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

  
Julie Curll

THIS DOCUMENT IS AN EXACT DUPLICATION, WITH THE EXCEPTION OF THE FORM OF THE SIGNATURE, OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.